**Hearing Date: December 16, 2010** 

Hearing Time: 10:00 a.m. (prevailing Eastern time)

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP 155 North Wacker Drive Chicago, Illinois 60606 John Wm. Butler, Jr. John K. Lyons Ron E. Meisler

- and -

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP Four Times Square New York, New York 10036

Attorneys for DPH Holdings Corp., et al., Reorganized Debtors

DPH Holdings Corp. Legal Information Hotline:

Toll Free: (800) 718-5305 International: (248) 813-2698

DPH Holdings Corp. Legal Information Website: http://www.dphholdingsdocket.com

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

----- X

In re : Chapter 11

DPH HOLDINGS CORP., et al., : Case No. 05-44481 (RDD)

: (Jointly Administered)

Reorganized Debtors.

REORGANIZED DEBTORS' SUPPLEMENTAL REPLY WITH RESPECT TO PROOF OF ADMINISTRATIVE EXPENSE CLAIM NO. 19566 (KENDRICK D. HOLMES)

("SUPPLEMENTAL REPLY – KENDRICK D. HOLMES")

DPH Holdings Corp. and certain of its affiliated reorganized debtors in the above-captioned cases (collectively, the "Reorganized Debtors") hereby submit this Supplemental Reply With Respect To Proof Of Administrative Expense Claim Number 19566 (the "Supplemental Reply") filed by the Mississippi Workers' Compensation Individual Self-Insurer Guaranty Association (the "Association") on behalf of Kendrick D. Holmes (the "Claimant") and respectfully represent as follows:

- On October 19, 2010, the Reorganized Debtors filed their Statement Of Disputed Issues With Respect To Proof Of Administrative Expense Claim Number 19566 (Kendrick D. Holmes) (Docket No. 20677) (the "Statement of Disputed Issues").
- 2. Because Mr. Holmes has not filed a supplemental response, the Statement of Disputed Issues is uncontested and the Reorganized Debtors rely upon the Statement of Disputed Issues.<sup>1</sup>
- 3. The Reorganized Debtors reserve all of the their rights to (a) supplement this Supplemental Reply and (b) assert that Mr. Holmes has not followed the claims objection procedures approved by this Court.

The Reorganized Debtors' have granted the Association an extension until November 18, 2010, to file a supplemental response. In the event that the Association files a supplemental response by that date, the Reorganized Debtors' deadline to file a supplemental reply will be December 6, 2010.

WHEREFORE the Reorganized Debtors respectfully request that this Court enter an order (a) modifying and allowing proof of administrative expense claim number 19566 as an administrative expense priority claim payable to the Claimant in the amount of \$23,935.00 in full satisfaction of proof of administrative expense claim number 19566 and (b) granting the Reorganized Debtors such other and further relief as is just.

Dated: New York, New York November 16, 2010

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/ John Wm. Butler, Jr.
John Wm. Butler, Jr.
John K. Lyons
Ron E. Meisler
155 North Wacker Drive
Chicago, Illinois 60606

- and -

Four Times Square New York, New York 10036

Attorneys for DPH Holdings Corp., <u>et al.</u>, Reorganized Debtors